

**UNITED STATES DISTRICT COURT**  
**EASTERN DISTRICT OF TENNESSEE**  
**AT KNOXVILLE**

PROGRESSIVE HAWAII )  
INSURANCE CORPORATION, )  
 )  
 Plaintiff, )  
 ) Civil Action No. 3:12-cv-00574  
 vs. )  
 )  
 NAKIA DAVIS, XAVIER BINGHAM, )  
 RYAN WESTBROOK, ESTATE OF )  
 JUSTIN WALKER, )  
 JAMES A. RUSSELL, ANGELIC )  
 HODGE, and )  
 ALLSTATE INSURANCE COMPANY, )

**Defendants.**

**MOTION FOR DEFAULT JUDGMENT**

Comes now the Plaintiff, Progressive Hawaii Insurance Company, by and through counsel, and requests the Court, pursuant to Rule 55(b)(1) of the Federal Rules of Civil Procedure, for the entry of a judgment by default against the defendant, Nakia Davis. In support of this request, the Plaintiff relies upon the record in this case and the affidavit submitted herein.

Respectfully submitted,

**TRAMMELL, ADKINS & WARD, P.C.**

s/ Terrill L. Adkins  
Terrill L. Adkins, BPR #013138  
Attorney for Progressive  
P.O. Box 51450  
Knoxville, Tennessee 37950  
865/330-2577

**CERTIFICATE OF SERVICE**

I hereby certify that on April 26, 2013, a copy of the foregoing pleading was filed electronically. Notice of this filing will be sent by operation of the court's electronic filing system to all parties indicated on the electronic filing receipt. All other parties will be served by regular U.S. mail. Parties may access this filing through the court's electronic filing system.

## TRAMMELL, ADKINS & WARD, P.C.

s/ Terrill L. Adkins  
Terrill L. Adkins